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11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**

13 ANGELES CHEMICAL COMPANY,
14 INC., a California corporation, et al.,

15 Plaintiff,

16 vs.

17 MCKESSON CORPORATION, a
18 California corporation, et al.,

19 Defendant.

Northern District Miscellaneous Matter
Case No. C 06-80343 Misc MMC (EDL)
Case No. C 07-80123 Misc MMC (EDL)

Case No. 01-10532 TJH (Ex)
Central District of California

**DECLARATION OF MAUREEN
BENNETT IN SUPPORT OF SSD'S
OPPOSITION TO PLAINTIFFS' MOTION
TO COMPEL SQUIRE, SANDERS &
DEMPSEY'S COMPLIANCE WITH
MARCH 22, 2007 COURT ORDER**

20 Date: June 6, 2007
21 Time: 9:00 a.m.
22 Courtroom: Courtroom E, 15th Floor

1 I, Maureen Bennett, declare as follows:

2 1. I am a partner with the law firm of Squire, Sanders & Dempsey L.L.P. ("SSD"). I
3 make this declaration of my own personal knowledge except as indicated below.

4 2. In 2002, I participated in certain legal work that SSD performed for Univar. As
5 part of that legal work, we worked with the client to gather sets of documents on legal issues as to
6 which Univar sought our advice relating to actual or potential claims or litigation with McKesson.
7 Privilege log item 51 is a portion of such a compilation. Item 51 (revised; see Declaration of
8 Diane L. Gibson, ¶18) includes a cover letter transmitting such documents to another law firm
9 representing Univar. It also includes those excerpts from the enclosures to the letter that may
10 have been received originally by Graham & James ("G&J") from McKesson in 1986, although
11 some of the documents may have come from sources other than McKesson. Item 54 is another
12 cover letter, but it does not include the compilation itself, and may be a draft.

13 3. Item 12 (revised; see Declaration of Diane L. Gibson, ¶19) is another compilation
14 of documents.

15 4. In 2002, Nicole Leonard, then an SSD associate, assisted me on work for Univar in
16 2002. SSD Privilege Log items 16 and 17 appear to be a draft and another version of a list that
17 Ms. Leonard prepared of some or all of the files selected for review as part of the work performed
18 for Univar in 2002. Nicole Leonard is no longer with SSD.

19 5. In 2002, SSD sent certain documents to Univar's counsel, at Univar's request.
20 SSD privilege log Item 33 (cover letter) and 14 (invoice including charge for shipping) reflect
21 such transmittal. These documents shipped included materials that, based on information belief
22 and may have been received by G&J from McKesson in 1986.

23 6. Occasionally, at the request of the client or in some cases at the request of one of
24 the consultants of the client on behalf of the client, we have transmitted documents that may have
25 included materials received by G&J from McKesson in 1986. SSD Privilege Log Items 45, 46
26 and 53 are cover letters reflecting such transmittals. Document 53 was in response to a request
27 from Univar's consultant related to legal issues or advice and/or to ongoing or anticipated claim
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1 or litigation. Upon review, we have determined that documents sent with log Items 45 and 46 did
2 not include documents received by G&J from McKesson in 1986 or indexes of such documents.

3 I declare under the penalty of perjury under the laws of the State of California that the
4 foregoing is true and correct. Executed this 22nd day of May 2007 at San Francisco, California.

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6 Maureen Bennett

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Declaration of Diane L. Gibson in Support of
Opposition to Order Shortening Time on
Motion to Compel